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January 11, 2007

FLORENCE P. BELSER
GENERAL COUNSEL

VIA EFILING AND HAND DELIVERY

Mr. Charles L. A. Terreni
Chief Clerk/Administrator
South Carolina Public Service Commission
101 Executive Center Drive, Suite 100
Columbia, SC 29210

Re: Application of GSC Telecommunications, Inc. for a Certificate of Public Convenience and Necessity to Provide Facilities-Based Local Exchange and Resold Long Distance Telecommunications Services and for Flexible Regulation Of Its Local Exchange Services and Alternative Regulations of Its Long Distance Service Offerings – **Docket No. 2006-342-C**

Dear Mr. Terreni:

The purpose of this letter is to respectfully request that the hearing in the above-referenced application be postponed until certain issues can be resolved or in the alternative that the application be rejected.

According to the Office of the Secretary of State, GSC Telecommunications, Inc. ("GSC") does not have a Certificate of Authority to operate as a foreign corporation in the state of South Carolina. GSC needs to obtain a Certificate of Authority from the Secretary of State.

Additionally, the Hearing is currently scheduled for Tuesday, February 20, 2007 and based on information provided by Dr. Johnson, his counsel will be out of the country at that time. Pursuant to S.C. Code Ann. § 58-9-280(B) (Supp. 2005), a Commission order denying or approving an application for local authority must be concluded no later than 120 days from the date of the filing of the application. The application was filed November 2, 2006 and 120 days from the filing date would be March 2, 2007, leaving the Commission and ORS with no opportunity to hear this matter, prepare and issue an Order.

If Dr. Johnson is unable to retain licensed counsel to represent GSC by February 20, 2007, ORS requests that the application be rejected but permit GSC to refile once it has obtained a Certificate of Authority and has retained local counsel. ORS requests that the Commission require GSC to notify the Commission and ORS no later than January 23, 2007, whether GSC has retained local counsel and that the Commission require substitute counsel for GSC to file a Notice of Appearance in this matter.

Thank you for your consideration of our request.

Sincerely,

Wendy B. Cartledge

Wendy B. Cartledge

Cc: Margaret Fox, Esquire
Marc Stollman, Esquire
Dr. Edward Johnson